

CAUSE NO. D-1-GN-18-007619

NICOLA SEAHORN,	§	IN THE DISTRICT COURT OF THE
	§	
Plaintiff,	§	
	§	
v.	§	419TH
	§	____ JUDICIAL DISTRICT
SIGNATURE HEALTHCARE	§	
SERVICES, LLC and	§	
GEORGETOWN BEHAVIORAL	§	
HEALTH INSTITUTE,	§	
	§	TRAVIS COUNTY, TEXAS
Defendants.	§	

PLAINTIFF'S ORIGINAL PETITION AND REQUEST FOR DISCLOSURES

Defendants fired Nicola Seahorn because she is an African-American who refused to cover up a patient assault in June 2018.

On June 26, 2018, a technician punched an adolescent patient in the face. According to eyewitnesses and video evidence, the assault knocked the patient out. Instead of firing the employee immediately, Signature Healthcare Services and Georgetown Behavioral Health Institute tried to cover it up. Management sprang into action coaching witnesses on what to say, how to frame the incident, and what needed to be done in order to protect their employee. Little thought was given to the patient. In an email, management directed other staff to "show unity" and keep their mouths shut.

Mrs. Seahorn refused to play along with the cover up. After all, patient care and safety were at stake. That's why when Mrs. Seahorn found out about the assault, she reported it to the Texas Health and Human Services Commission. The

Commission investigated and confirmed what Mrs. Seahorn reported. Within two weeks of her report, Defendants fired her. The stated reason from CEO Lisa Salter: “I just don’t think this is the right fit. It’s a philosophy thing.”

There is also distinct racial aspect to Mrs. Seahorn’s termination. Throughout her employment, she was the only African American at the director level. Because of that, Mrs. Seahorn was subjected to:

- Racial slurs. For example, Mrs. Seahorn and other African American employees were described by coworkers, including the CEO, as “ghetto.”
- Racially motivated scrutiny. For example, Defendants’ HR director sought out complaints about Mrs. Seahorn’s “black tone” and “attitude.” Unlike the Caucasian directors, Mrs. Seahorn’s credentials and military service were routinely questioned by coworkers.
- Racially motivated comments about her appearance. For example, upon seeing Mrs. Seahorn in one of her wigs, Dr. Floca asked, “What’s wrong, black people hair don’t grow?” At a company picnic where Mrs. Seahorn was wearing a blonde wig, a nurse commented sarcastically that she did not know “black people had blonde hair.”
- Bullying from the non-African American director-level employees. The treatment was so bad that Ms. Salter referred to it as “bullying” and acknowledged that the other directors were trying to sabotage Mrs. Seahorn’s work.

Mrs. Seahorn complained multiple times about this discriminatory treatment, but it never stopped. Then, because of her race and complaints, Defendants fired her. Defendants replaced her with a Caucasian employee the CEO says can't do the job and refers to the replacement's employment as "a joke."

In firing Mrs. Seahorn, Defendants have violated the Texas Health & Safety Code and the Texas Labor Code.

I. DISCOVERY CONTROL PLAN

1. Plaintiff intends that this suit be governed by discovery control level two.

II. PARTIES

2. Plaintiff Nicola Seahorn is an individual who resides in Bexar County, Texas.
3. Defendant, Signature Healthcare Services, LLC, is a foreign corporation that can be served through its registered agent, Northwest Registered Agent, LLC at 700 Lavaca, Ste. 1401, Austin, TX 78701.
4. Defendant, Georgetown Behavioral Health Institute, LLC, is a domestic corporation that can be served through its registered agent Joe Rodriguez at 3101 S. Austin Ave., Georgetown, TX 78626.

III. JURISDICTION AND VENUE

5. Jurisdiction is appropriate because Signature Healthcare Services does business in Texas, Georgetown Behavioral is a domestic corporation, and the acts giving rise to this petition occurred in the State of Texas.

6. Venue is appropriate under the venue provision of Tex. Health & Safety Code § 161.134(g)(2) which states that “A suit under this section may be brought in the district court of the county in which . . . the defendant conducts business.” Defendants conduct business in Travis County by receiving patients who live in Travis County, marketing for patients in Travis County, and transferring patients to and from Travis County facilities. Under the Civil Practices and Remedies Code, statute specific venue provisions override general venue provisions.

IV. FACTS

A. Nicola Seahorn is a highly qualified, licensed Clinical Social Worker/Psychotherapist who should not have been fired.

7. Mrs. Nicola Seahorn is an African American woman who graduated magna cum laude from Our Lady of the Lake University in San Antonio with a Master’s degree in Social Work.
8. Before that, Mrs. Seahorn honorably served her country in the Army.
9. In the Army, Mrs. Seahorn was a Commanding Officer of two medical companies. In fact, Mrs. Seahorn’s leadership skills, integrity, competency, hard-work ethic, and dedication to the Army’s mission made her a ‘must select’ over her peers for both of those commands.
10. The first medical company she commanded was in Honduras. There, she worked with a Joint Task Force that also included the Air Force and Marines. Mrs. Seahorn was responsible for sending the first Army troops to support the

medical mission regarding the Columbian War. Her troops and medical staff returned without any fatalities.

11. In Iraq, she planned, coordinated, and supervised internal operations for five companies with over 742 soldiers. She prepared and developed the battalion's defense plan, as well as planned and coordinated tactical movements for all convoys going outside the base.

12. Upon return from Iraq, Mrs. Seahorn was personally selected to command Charlie Company, 2nd Infantry Division.

13. Since 2004, Mrs. Seahorn has successfully worked at Fort Hood, Walter Reed Medical Center, Fort Bragg, and Lackland Air Force Base.

14. Currently, Mrs. Seahorn is completing her Ph.D. in Forensic Psychology with a 4.0 GPA.

15. Mrs. Seahorn has a 100% disability rating from the VA for among other things, PTSD, anxiety, and migraines.

16. Defendants hired Mrs. Seahorn in April 2018 as the Director of Clinical Services, which is the second largest division within the facility.

17. Signature Healthcare and Georgetown Behavioral ignored the above achievements and instead chose to discriminate and retaliate against Mrs. Seahorn based on her reports of violations of law, her race, and her complaints of discrimination.

B. Defendants engaged in multiple unlawful, immoral, and unethical activities while Mrs. Seahorn was employed there.

18. During Ms. Seahorn's tenure at Georgetown Behavioral, she witnessed and discovered many unethical and unlawful practices.
19. She reported these actions to the other directors, to the CEO, through the corporate complaint line, and to the Texas Health and Human Services Commission (HHSC) in June 2018.
20. For example, Defendants forged admission criteria for patients with insurance in order to collect insurance money. This act of forgery violates, among other statutes, Texas Penal Code Chapter 31 and §§ 32.21, 32.46, 32.47, 35.02 37.10.
21. Defendants unlawfully and unethically pressured Ms. Seahorn to prevent patients with insurance from leaving the facility until the insurance money had been maxed out. This behavior violated, among other statutes, Texas Penal Code Chapter 31 and §§ 32.46, 32.47, 35.02.
22. Defendants unlawfully covered up assaults by employees against patients and assaults by patients against other patients. This violates, among other statutes, Texas Penal Code Chapter 7 and 22, including § 22.04, as well as provisions of the Texas Health and Safety Code including § 161.132.
23. Defendants did not properly treat patients with lice and allowed them to interact with the general population at the facility. This behavior violates the Texas Health and Safety Code.

24. Defendants turned away patients that met all the admission criteria because they did not have insurance.

25. Mrs. Seahorn also reported that there is dangerous mold in the facility that is affecting her health and potentially the health of patients.

26. Since Mrs. Seahorn's termination, the presence of mold and its effect on patients has been confirmed.

C. In late June 2018, Defendants attempted to cover up the assault of an adolescent patient with a disability by one of their employees.

27. On or about June 26, Georgetown Behavioral attempted to cover up an incident where an adult mental health technician punched an adolescent mental health patient in the face with a closed fist.

28. According to the video of the incident, after being hit, the child fell to the ground and appeared unconscious for a few seconds. Witness statements from other patients confirm the patient was knocked out.

29. Instead of firing this tech immediately, management coached witnesses on what to say to the police and investigators to cover it up.

30. When Ms. Seahorn discovered that Defendants meant to cover up the incident, she called the corporate office and reported it. Then she reported it to the Texas Health and Human Services Commission.

31. On June 27, 2018, Lisa Salter, the CEO of Georgetown Behavioral called Ms. Seahorn, enraged, demanding to know what Ms. Seahorn had done, to whom she had reported the incident, and who was coming to investigate her hospital.

32. After HHSC investigated the incident, Defendants were forced to fire the tech.

33. Within two weeks of Mrs. Seahorn's report to HHSC, she would be fired.

D. Defendants discriminated against Mrs. Seahorn because of her race.

34. At the time of her hiring, Mrs. Seahorn was the only African American in a director-level position. This fact put a target on her back.

35. Immediately upon hire, she was subjected to a racially hostile environment.

36. Co-workers, subordinates, and superiors repeatedly commented on the way she spoke and her hair.

37. For example, the HR Director, in an attempt to get Mrs. Seahorn fired, sought out Caucasian employees to make complaints about Mrs. Seahorn's "black tone" and "attitude."

38. Dr. Floca repeatedly made racist comments to Mrs. Seahorn about her wigs, which Mrs. Seahorn wears due to hypothyroidism. For example, Dr. Floca once insultingly asked Mrs. Seahorn, "What's wrong, black people hair don't grow?"

39. At a company picnic, a Caucasian nurse asked Mrs. Seahorn about her wigs in front a full table of other staff who all burst out laughing. Later at the same picnic, a staff member derisively commented on Mrs. Seahorn's blonde wig, stating she did not know that "black people had blonde hair."

40. The other white Directors singled out Mrs. Seahorn for criticism, undermined her work, and engaged in a coordinated campaign to have her fired.

41. Defendants were aware of this racially hostile environment. Specifically, Ms. Salter has admitted on tape that the white directors and coworkers were “bullying” Ms. Seahorn and sabotaging her work. During that same meeting, Ms. Salter also acknowledged that she had not done anything to stop it.
42. Unlike white employees, Mrs. Seahorn’s resume and accomplishments were routinely questioned. Specifically, she was continuously interrogated about her military service and achievements. She was repeatedly asked about whether or not she had really served in Iraq and whether or not she had actually ‘retired’.
43. Other African Americans were similarly discriminated against because of their race. For example, when Mrs. Seahorn tried to get raises for two African American employees, the requests were denied. However, raises requested for Latino and white employees were quickly approved.
44. Finally, Ms. Salter herself as well as other white employees referred to some African American employees, including Mrs. Seahorn, as “ghetto.” In fact, during a June 21, 2018 meeting with Mrs. Seahorn, Ms. Salter can clearly be heard on the recording describing one African American employee as “ghetto. Ghetto fab, but ghetto.”

E. Mrs. Seahorn engaged in protected activity when she complained of race discrimination on multiple occasions.

45. On several occasions, including at least on June 15 and June 21, 2018, Mrs. Seahorn complained of the race discrimination she was experiencing herself and witnessing against other African American employees.

46. Instead of addressing the issues, Defendants retaliated against Mrs. Seahorn.

F. Defendants fired Mrs. Seahorn because of her reports of whistleblower activity, her race, and her complaints of discrimination.

47. On June 27, 2018, after Mrs. Seahorn had reported the June 26 patient punching incident to HHSC, Ms. Salter sent out email to her team telling them to “show unity” and to “keep your thoughts and opinions to yourself” about the incident. This email was in direct response to Mrs. Seahorn’s report to HHSC.

48. On June 28, Ms. Salter sent Mrs. Seahorn an email stating that she was disappointed in the way Mrs. Seahorn reported the incident to HHSC without first contacting her to discuss it: “I do not understand why you wouldn’t have called me.”

49. On July 10, 2018, Ms. Salter fired Mrs. Seahorn, stating, “I think our employment has kinda run its course . . . I just don’t think this is the right fit. It’s a philosophy thing.” No other explanation has ever been given.

50. This stated reason is mere pretext for discrimination and retaliation.

G. Documents and recordings corroborate all of the above facts.

51. Recordings, documents, and witness statements establish, at least, the following facts:

- Mrs. Seahorn was fired for pretextual reasons. Specifically, in one recording, Ms. Salter states she has no case to build against Mrs. Seahorn. In fact, on more than one occasion, Ms. Salter says Mrs. Seahorn “is exactly what Georgetown Behavioral Health needs as a clinical services director.”

- Despite lacking grounds for termination, Defendants told Ms. Salter to fire Mrs. Seahorn. Ms. Salter resisted firing Mrs. Seahorn until Mrs. Seahorn told HHSC what was going on at Georgetown Behavioral.
- On June 21, Mrs. Salter described Mrs. Seahorn's treatment by her white coworkers as "bullying."
- Ms. Salter knows Georgetown Behavioral is "fucked up," "a mess," and that she has failed to support Mrs. Seahorn in her job.

H. Defendants replaced Mrs. Seahorn with an unqualified white employee.

52. Mrs. Seahorn has since been replaced by an unqualified white employee.

53. This is not merely the opinion of Mrs. Seahorn, but of Ms. Salter herself. In the June 15 recording, Ms. Salter admits that the employee who replaced Mrs. Seahorn is not capable of doing the job. In fact, Ms. Salter describes that employee's work as "a joke."

I. Both internal and external investigations of Defendants' conduct confirm Mrs. Seahorn's allegations.

54. Since Mrs. Seahorn was terminated, HHSC has conducted several investigations of Defendants' facilities and behavior.

55. There have also been multiple internal investigations by Defendants themselves.

56. These investigations have already confirmed many of Mrs. Seahorn's allegations.

57. Moreover, Ms. Salter was suspended pending investigation into how Mrs. Seahorn was treated. Based on Defendants' own internal investigation, Ms. Salter has now been terminated.

J. Defendants continue to engage in unlawful, unethical, and immoral conduct.

58. Since Mrs. Seahorn's termination, there have been numerous additional incidents at Georgetown Behavioral.

59. According to one current employee, in July or August 2018, Defendants admitted a patient to the Pediatric Intensive Care Unit even though the patient did not meet admissibility criteria. In the process of admitting this patient, the patient punched two nurses. Because Georgetown Behavioral was understaffed, this patient was heavily sedated to the point of being a "zombie." Because of the heavy medication Defendants gave the patient, the patient's condition declined rapidly. In fact, the patient's condition worsened so much that the patient had to be hand fed all meals. During the patient's stay at the hospital, the patient was observed going in and out of consciousness with eyes rolling to the back of the patient's head. Then the patient had several seizures and almost died. The patient has suffered permanent injury and will require a "two-person assist" for the rest of the patient's life.

60. When another patient punched a wall, the nurse only provided the patient with a Tylenol and did nothing else. Later when the patient was discharged and the patient's mom took her child to the emergency room, it was discovered that the patient's hand was actually broken and required a cast.

61. Not only are patients being hurt and poorly cared for, but Defendants are also failing to protect their own employees. Several nurses have been hit by patients. Because of the unsafe working environment, several nurses have invoked the safe harbor provisions under Texas Board of Nursing Rule 217.20. When management found out about the invocation of safe harbor, Defendants' head of nursing and their COO tried to get the nurses to retract the nurses safe harbor requests.

62. Defendants have also forged, altered, and destroyed medical records and other documentation in order to pass inspections from HHSC.

63. All of these allegations are corroborated by recordings, witness statements, and documents.

K. Defendants have not properly paid Mrs. Seahorn her relocation expenses and bonuses.

64. Mrs. Seahorn was promised \$5,000 in relocation expenses as well as bonuses.

65. Mrs. Seahorn was also eligible for bonuses including the Ancillary Bonus Incentive.

66. To date, none of the above expenses or bonuses Defendants agreed to pay Mrs. Seahorn have been paid her.

L. All conditions precedent to suit have been met.

67. On September 5, 2018, Mrs. Seahorn filed a charge of discrimination with the EEOC and Texas Workforce Commission. Mrs. Seahorn has requested the right to sue from the Texas Workforce Commission.

68. All conditions precedent to the filing of this suit have been met.

V
RETALIATION UNDER THE HEALTH AND SAFETY CODE

69. Plaintiff incorporates and reasserts paragraphs 1-68 as if restated herein.

70. Defendants violated the Health and Safety Code when they terminated Mrs. Seahorn for reporting violations of law to her supervisor, other directors, the corporate complaint line, and the Texas Health and Human Services Commission.

71. Defendants are a hospital, mental health facility, or treatment facility under the Health and Safety Code.

72. Plaintiff was an employee of Defendants.

73. Plaintiff was fired within 60 days of reporting the violations of law.

74. Under the Health and Safety Code, it is presumed that the “employee was disciplined or discriminated against for making a report related to a violation.”
Tex. Hum. & Safety Code § 161.134(f)

75. Because of the actions of the Defendants, Plaintiff suffered damages within the jurisdictional limits of this Court.

VI.
TEXAS LABOR CODE DISCRIMINATION

76. Plaintiff incorporates paragraphs 1-75 as if restated herein.

77. Mrs. Seahorn is African American and was employed by Defendants.

78. Defendants are an employer under Chapter 21 of the Texas Labor Code.

79. Defendants subjected Plaintiff to disparate treatment because of her race including by subjecting her to a hostile environment and by failing to take prompt and remedial action to fix the problem.

80. Defendants were motivated by Plaintiff's race in terminating her.

81. Defendants replaced Plaintiff with a non-African American employee.

82. Defendants' actions violate the Texas Labor Code.

VII. TEXAS LABOR CODE RETALIATION

83. Plaintiff incorporates paragraphs 1-82 as if restated herein.

84. Plaintiff engaged in protected activity when she complained and alleged that she was being treated differently based on her race.

85. Defendants violated the Texas Labor Code when they terminated Plaintiff for engaging in that protected activity.

VIII. BREACH OF CONTRACT

86. Plaintiff incorporates paragraphs 1-85 as if restated herein.

87. Plaintiff was offered relocation expenses and bonuses as part of her compensation for working at Georgetown Behavioral. Plaintiff accepted this offer.

88. Defendants never paid the agreed expenses and bonuses.

89. Defendants breached their compensation contract with Mrs. Seahorn.

IX. FRAUD

90. Plaintiff incorporates paragraphs 1-89 as if restated herein.

91. Defendants represented to Plaintiff that she would receive relocation expenses and bonuses if she worked for them.
92. This representation was material.
93. Defendants represented to Plaintiff that she would be paid her relocation expenses at the time she was terminated. This representation was also material.
94. Defendants knew the above representations were false.
95. Defendants intended for Plaintiff to act on the above representations.
96. Plaintiff relied on the representations.
97. By refusing to pay the relocation expenses and bonuses, Defendants have caused Plaintiff to suffer an injury.
98. Defendants committed these actions knowingly and with the purpose of taking the relocation expenses and bonuses promised to Plaintiff.
99. Defendants' actions constitute fraud against Plaintiff.

X.
QUANTUM MERUIT

100. Plaintiff incorporates paragraphs 1-99 as if restated herein.
101. Plaintiff provided valuable services to Defendant as the Director of Clinical Services.
102. These services were given or provided to Defendants.
103. Defendants accepted these services and benefits with the knowledge that Plaintiff expected compensation in the form of relocation expenses and bonuses.

104. By refusing to pay Plaintiff these relocation expenses and bonuses with the intent of depriving her of them, Defendants were unjustly enriched.

105. Defendants are liable under Texas Common Law for quantum meruit.

XI.
JURY DEMAND

106. Plaintiff demands trial by jury and will tender the appropriate fee.

XII.
REQUEST FOR DISCLOSURE

107. Defendant is requested to disclose, within 50 days of service of this request, the information and material described in Rule 194.2.

XIII.
DAMAGES

108. Plaintiff seeks all damages allowed under the Health and Safety Code, including monetary relief over \$1,000,000 and:

(a) Plaintiff seeks an injunction prohibiting Defendants from engaging in unlawful practices.

(b) Plaintiff seeks additional equitable relief as may be appropriate such as reinstatement, promotion, back pay, front pay, and court costs.

(c) Plaintiff seeks punitive damages because Defendants actions were done intentionally, knowingly, maliciously, fraudulently, and/or with gross negligence.

(d) Plaintiff seeks compensatory damages for emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other nonpecuniary losses.

(e) Plaintiff seeks reasonable attorney's fees and costs including reasonable expert fees.

(f) Plaintiff seeks pre and post judgment interest at the maximum rate allowed by law.

WHEREFORE, premises considered, Plaintiff respectfully prays that Defendants be cited to appear and, that upon a trial on the merits, that all relief requested be awarded to Plaintiff, and for such other and further relief to which Plaintiff is justly entitled.

Respectfully submitted,
WILEY WALSH, P.C.

By: /s/ Colin Walsh
Colin Walsh
Texas Bar No. 24079538
*Board Certified Specialist, Texas Board of
Legal Specialization, Labor and Employment
Law*
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ATTORNEYS FOR PLAINTIFF

CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY): _____ COURT (FOR CLERK USE ONLY): _____

STYLED Nicola Seahorn v. Signature Healthcare Services, LLC and Georgetown Behavioral Health Institute

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:		Names of parties in case:		Person or entity completing sheet is:
Name: Colin Walsh	Email: colin@wileywalsh.com	Plaintiff(s)/Petitioner(s): Nicola Seahorn	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____	
Address: 1011 San Jacinto Blvd. #401	Telephone: 512-271-5527	Additional Parties in Child Support Case:		
City/State/Zip: Austin, TX 78701	Fax: 512-201-1263	Defendant(s)/Respondent(s): Signature Healthcare Services, LLC; Georgetown Behavioral Health Institute	Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____	
Signature: <i>/s/ Colin Walsh</i>	State Bar No: 24079538	[Attach additional page as necessary to list all parties]		
2. Indicate case type, or identify the most important issue in the case (select only 1):				
<i>Civil</i>			<i>Family Law</i>	
Contract <i>Debt/Contract</i> <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ <i>Foreclosure</i> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <i>Malpractice</i> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: _____ <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <i>Product Liability</i> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <i>Divorce</i> <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____
Employment <input checked="" type="checkbox"/> Discrimination <input checked="" type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input checked="" type="checkbox"/> Other Employment: Whistleblower	Other Civil <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property </div> <div style="width: 45%;"> <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____ </div> </div>			
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	Probate & Mental Health <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <i>Probate/Wills/Intestate Administration</i> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings </div> <div style="width: 45%;"> <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____ </div> </div>			
3. Indicate procedure or remedy, if applicable (may select more than 1):				
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover		
4. Indicate damages sought (do not select if it is a family law case):				
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000				